UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

:

:

v.

Criminal Number: 07-76 (MLC)

CURTIS G. WHITEFORD,

DEBRA M. HARRISON,

MICHAEL B. WHEELER,

To be filed Under Seal

SEYMOUR MORRIS, JR.,

WILLIAM DRIVER,

Defendants.

GOVERNMENT'S APPLICATION FOR ORDER PERMITTING SPECIAL AGENTS TO TRANSPORT INMATE ROBERT STEIN

Comes now the United States of America, by and through its undersigned counsel, and hereby submits this application for an order permitting Internal Revenue Service Criminal Investigations ("IRS-CI") Special Agents Cam Costello, Randolph Gregory, Special Inspector General for Iraq Reconstruction ("SIGIR") Special Agent Wallace Young, and/or Immigration and Customs Enforcement ("ICE") Special Agent David Papazian to take Robert Stein (BOP # 16385-056) out of the Monmouth County Correctional Institution ("MCCI") on September 6, 2008, at approximately 8:00 a.m. for the purpose of transporting him to the United States Courthouse for the District of New Jersey in Trenton, New Jersey so that he may meet with the undersigned in preparation for the upcoming criminal trial, United States v. Whiteford, 07-Cr-76, before the Honorable Mary L. Cooper.

1. On September 6, 2008, IRS-CI and ICE agents will be assigned to take the

defendant to the District of New Jersey in Trenton, New Jersey. The Defendant will then be

returned by those Agents to MCCI at approximately 6:00 p.m. the same day.

2. The U.S. Marshals Service has been advised of and has no objection to this

application.

3. The defendant's attorney has been notified of these transfers and meetings and

has no objection.

4. Because the defendant is a named co-conspirator in the upcoming trial, the

government respectfully requests that this application and accompanying order be filed under

scal.

WHEREFORE, it is respectfully requested that this Court issue an order

permitting Special Agents of the IRS-CI and/or ICE to take the defendant from the Monmouth

County Jail on September 6, 2008 and transport him to the to the United States Courthouse for

the District of New Jersey in Trenton, New Jersey, and to return him to the MCCI no later than

7:00 p.m.

Dated: September 4, 2008

WILLIAM M. WELCH

Chief, Public Integrity Section

/s/

ANN C. BRICKLEY

JOHN P. PEARSON

Trial Attorneys

U.S. Department of Justice

Criminal Division

1400 New York Ave., NW

Washington, DC 20005

(202) 514-1412

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SEYMOUR MORRIS, JR., WILLIAM DRIVER,

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Defendants.

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ORDER

Upon consideration, the Government's Application for Order Permitting Special Agents to Transport Defendant is hereby Granted. Special Agents of the Internal Revenue Service Criminal Investigations ("IRS-CI") Special Agents Cam Costello, Randolph Gregory, Special Inspector General for Iraq Reconstruction ("SIGIR") Special Agent Wallace Young and/or Immigration and Customs Enforcement ("ICE") Special Agent David Papazian are hereby permitted to take Robert Stein (BOP # 16385-056) out of the Monmouth County Correctional Institution ("MCCI") on September 6, 2008, at approximately 8:00 a.m. and transport him to the to the United States Courthouse for the District of New Jersey in Trenton, New Jersey. The defendant will be returned no later than 7:00 p.m.

This order will be sealed until further notice.

ORDERED this 4th day of street, 2008.

HONORABLE MARY LACOOPER

UNITED STATES DISTRICT JUDGE